

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001994

**Submission Date:** 07/15/2010

**Organization Type:** Educational Institution

**Organization Name:** Southern Adventist University

**First Name:** David

**Last Name:** Ekkens

**Job Title:** Preofessor, Biology

**Key Topic:** Alcoholic Beverages, Carbohydrates, Eating Patterns

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** It is sad to see this report that is so heavily biased in favor of the meat, diary, fishing and egg industries and so heavily biased against the health of Americans. Literally tons of evidence has accumulated showing the BIG benefits of a plant-based, whole food diet but it is not politically correct to say that.  
Some of the recommendations in this report are misleading and downright dangerous. It is unforgivable for your esteemed committee to tell people it is OK to drink in order to gain a small cardiac benefit when alcohol use so significantly (negatively) impacts the lives of Americans. You will cause untold suffering.  
The diet you are recommending in this report is what is killing Americans (on average ten years early) and costing the huge "health care" price we are paying.

**Comment ID:** 001051

**Submission Date:** 06/18/2010

**Organization Type:** Educational Institution

**Organization Name:** Charleston Area Medical Center

**First Name:** Susan

**Last Name:** Poindexter

**Job Title:** Nutrition and Diabetes Educator

**Key Topic:** Alcoholic Beverages, Carbohydrates, Energy Balance/Physical Activity, Fats

**Sub Topic:** Glycemic index, Saturated fatty acids, Trans fatty acids, Weight loss, Whole grains

**Attachment:** N

**Comment:** Stronger advice warranted against use of alcohol.  
Stronger advice to use carbohydrate containing food as close as possible to natural state - i.e. whole grains, un sugared fruits, vegetables.  
Stronger advice to avoid trans fat.  
Stronger encouragement of plant based diet.  
Stronger recommendation to make all grains consumed whole grains.  
Stronger message to eat less, move more.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001083

**Submission Date:** 06/22/2010

**Organization Type:** Educational Institution

**Organization Name:** UMN Extension

**First Name:** Nadine

**Last Name:** Bayer

**Job Title:** Nutrition Education Assistant

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** According to the Guidelines, the only way to lose weight is to balance calories consumed and activity using them. It doesn't work for many, many people. It seems obvious that the low-fat era has lead the nation to obesity with the thousands of refined, but low-fat carbohydrates-food on the market. We know the effect of carbs on insulin, yet do not discourage folks from consuming them. When the largest segment of the Pyramid is the grain section, people see it as license to consume mostly carbs. Along with decreasing added sugars and transfat, we need to talk about fewer carbs -- and do the additional research to back it up

**Comment ID:** 001952

**Submission Date:** 07/15/2010

**Organization Type:** Educational Institution

**Organization Name:** Penn State University

**First Name:** Penny

**Last Name:** Kris-Etherton

**Job Title:** Distinguished Professor of Nutrition

**Key Topic:** Carbohydrates

**Sub Topic:** Fiber

**Attachment:** Y

**Comment:** See the attached letter for my comments about dietary fiber.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001315

**Submission Date:** 07/01/2010

**Organization Type:** Educational Institution

**Organization Name:** State University of New York at Geneseo

**First Name:** Wendy

**Last Name:** Pogozeleski

**Job Title:** Professor of Biochemistry

**Key Topic:** Carbohydrates, Evidence-based Review Process, Fats

**Sub Topic:** Low carbohydrate, Oils, Unsaturated fatty acids, Saturated fatty acids

**Attachment:** N

**Comment:** The guidelines are wrong in three respects: 1) They don't consider that total carbohydrate intake can drive obesity, regardless of whether those carbohydrates come from sugar or whole grains. 2) They treat all populations the same, when children and type 1 and type 2 diabetics have much different needs. 3) They don't reflect the latest research showing the benefits of good fats and the dangers of fat restriction in children. I fear that schools and states will use these new guidelines, with the result that they will continue to INCREASE obesity, behavior problems, and diabetes in the most vulnerable populations. I recommend adding a caveat that children need fat and that the 20 million diabetics in this country need to monitor carbs closely.

**Comment ID:** 001953

**Submission Date:** 07/15/2010

**Organization Type:** Educational Institution

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Cholesterol, Low carbohydrate

**Attachment:** Y

**Comment:** Ancel Keys's Seven Country Study, which has been used as the basis of our low fat diet, did NOT prove that fat, especially saturated fat, was associated with heart disease. Only one food was positively correlated with heart disease across all of the countries he studied, and that was SUGAR! All carbohydrates are metabolized like sugar. If we do not eat fat, we will die. If we do not eat protein, we will die. If we do not eat carbohydrates, we will live. Please ask any scientist to confirm this fact. Reducing fat is detrimental to our health.

I have lost 26 pounds on a high fat, low carb diet, and am off my blood pressure meds. I feel fine, and my total cholesterol measurement has gone down, not up. I eat NO fruit, NO root vegetables, NO grain. And I am 69 years old and very healthy now.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

Archeologists will tell you that the onset of osteoporosis and tooth decay were not detected until after the domestication of grains. What we need to eliminate or reduce in our diets is grain, not fat.

The new dietary guidelines must follow science, not "groupthink," and properly address the damage that our low fat diets have done to our health over the past several decades.

**Comment ID:** 002074

**Submission Date:** 07/15/2010

**Organization Type:** Educational Institution

**Organization Name:** Harvard School of Public Health

**First Name:** Walter

**Last Name:** Willett, MD, DrPH

**Job Title:** Chair, Dept of Nutrition; Fredrick John Stare Professor of Epidemiology and Nutrition

**Key Topic:** Carbohydrates, Fats, Food Groups, Minerals, Other, Vitamins

**Sub Topic:** Added sugars, B Vitamins, Calcium, Folate, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vitamin D, Whole grains

**Attachment:** Y

**Comment:** The report has made positive changes but has some shortcomings (see attachment). Positive changes: stronger recommendation to reduce sugary beverages; greater emphasis on sodium reduction; and much less emphasis on the percentage of energy from total fat, which is correctly described as not related to weight gain, obesity, or any other major health outcome. Shortcomings: (1) Total fat is still recommended to be less than 35% of calories, and there is no basis for setting an upper limit on total fat. (2) The recommendation for three servings of milk per day is not justified and is likely to cause harm to some people. Prospective studies and randomized trials have consistently shown no relation between milk intake and fracture risk, yet many studies have shown a relation between high milk intake and risk of fatal or metastatic prostate cancer. (3) The recommendation for high intake of lean meat is worrisome: There is substantial evidence that high heme iron intake may increase diabetes risk; red meat consumption has been associated with incidence of colorectal cancer; and there is some data that red meat consumption during adolescence and early adult life is associated with higher risks of premenopausal breast cancer in women. (4) The report seems relatively silent on vitamin D, even though there is strong evidence that blood levels are not optimal for 2/3 of Americans. Vitamin D supplementation is probably the safest way to increase levels, and it has been shown to reduce risk of fractures in randomized trials if the dose is 700 IU per day or more. (5) The report does not reinforce adequately the CDC recommendation that women of reproductive age who might possibly become pregnant should take a supplement of folic acid, which is most conveniently done as part a multiple vitamin. (6) The report still suggests that having half of grains as refined grains is healthy. Refined grains have adverse metabolic effects and provide many empty calories and minimal benefits.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002076

**Submission Date:** 07/15/2010

**Organization Type:** Educational Institution

**Organization Name:** Harvard School of Public Health

**First Name:** Meir

**Last Name:** Stampfer, MD, DrPH

**Job Title:** Professor of Nutrition and Epidemiology

**Key Topic:** Carbohydrates, Fats, Food Groups, Minerals, Vitamins

**Sub Topic:** Added sugars, B Vitamins, Calcium, Folate, Grains, Whole grains, Iron, Meat, Beans, Eggs, Fish, and Nuts, Milk, Other, Sodium, Vitamin D, Whole grains

**Attachment:** Y

**Comment:** The report has made positive changes but has some shortcomings (see attachment). Positive changes: stronger recommendation to reduce sugary beverages; greater emphasis on sodium reduction; and much less emphasis on the percentage of energy from total fat, which is correctly described as not related to weight gain, obesity, or any other major health outcome. Shortcomings: (1) Total fat is still recommended to be less than 35% of calories, and there is no basis for setting an upper limit on total fat. (2) The recommendation for three servings of milk per day is not justified and is likely to cause harm to some people. Prospective studies and randomized trials have consistently shown no relation between milk intake and fracture risk, yet many studies have shown a relation between high milk intake and risk of fatal or metastatic prostate cancer. (3) The recommendation for high intake of lean meat is worrisome: There is substantial evidence that high heme iron intake may increase diabetes risk; red meat consumption has been associated with incidence of colorectal cancer; and there is some data that red meat consumption during adolescence and early adult life is associated with higher risks of premenopausal breast cancer in women. (4) The report seems relatively silent on vitamin D, even though there is strong evidence that blood levels are not optimal for 2/3 of Americans. Vitamin D supplementation is probably the safest way to increase levels, and it has been shown to reduce risk of fractures in randomized trials if the dose is 700 IU per day or more. (5) The report does not reinforce adequately the CDC recommendation that women of reproductive age who might possibly become pregnant should take a supplement of folic acid, which is most conveniently done as part a multiple vitamin. (6) The report still suggests that having half of grains as refined grains is healthy. Refined grains have adverse metabolic effects and provide many empty calories and minimal benefits.

**Comment ID:** 000977

**Submission Date:** 06/15/2010

**Organization Type:** Educational Institution

**Organization Name:** Cal Poly San Luis Obispo

**First Name:**

**Last Name:**

**Job Title:** Researcher

**Key Topic:** Carbohydrates, Food Safety

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** There exists peer-reviewed research that proves half of all high fructose corn syrup-based products in the United States contain mercury. No level of mercury is acceptable in a

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**Key Topic: Carbohydrates**

child's food. If you do not remove high fructose corn syrup from the diet of developing children, you are not genuine in your efforts to reduce childhood obesity or improve the health of the citizenry.

**Comment ID:** 001802

**Submission Date:** 07/13/2010

**Organization Type:** Federal Agency

**Organization Name:** United States of Department of Agriculture

**First Name:** Andrew

**Last Name:** Toussaint

**Job Title:** Legislative Assistant

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** More carbohydrates? That is bizarre. Low nutritional value. Eat fruits, vegetables, and meats. Not breaded products, bread, flour, etc.

**Comment ID:** 001246

**Submission Date:** 06/26/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Rene

**Last Name:** Sugar

**Job Title:**

**Key Topic:** Alcoholic Beverages, Carbohydrates, Food Safety

**Sub Topic:**

**Attachment:** Y

**Comment:** Comments on carbohydrates, fatty acids, alcohol and food safety.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001276

**Submission Date:** 06/28/2010

**Organization Type:** Individual/Professional

**Organization Name:** Private Citizen

**First Name:** Dan

**Last Name:** Clem

**Job Title:** Engineer

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I used to follow the food pyramid. I tried to limit fat and ate plenty of complex carbohydrates. The result was years of morbid obesity and type 2 diabetes. Now I am taking the opposite approach of limiting carbs and not worrying about fat and I'm getting better.

The new guidelines are just more of the same "one size fits all." We are all different and some of us are suited to different diets. Too bad the committee didn't realize this and recommend different dietary approaches. I will continue to be a dietary renegade until the guidelines change.

**Comment ID:** 001283

**Submission Date:** 06/28/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sarabeth

**Last Name:** Carr

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** Since many people are unable to metabolize carbohydrates without raising their blood sugar levels, I feel the government guidelines re: carbohydrates should include a caveat on the amount eaten daily or per meal.

Also the current emphasis on low fat diets has failed to successfully address the problem of obesity in our country. Research has shown that limiting carbohydrate intake while not limiting protein and fat in the diet results in weight loss and lower cholesterol levels. For some reason-corporate pressure probably, this research tends to be ignored while low fat diets continue to be stressed. This needs to be changed from government recommendations on down.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001284

**Submission Date:** 06/28/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:** Professor

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I am diabetic type 2, and only after a lot of searching around after i was diagnosed in 2000, I found Dr. Bernstein and others low carb solution. Without any effort, I lost 30 pounds, and I have lowered my blood sugars below the level i had when I was diagnosed (my A1C went from 6.1 before to 5.5 now, 10 years later.) If I had known about low carb I would not be diabetic.

I think that the high carb, low fat "healthy" diet the USDA is pushing for is criminal, and its results are obvious: an obese population, diabetic type 2 children, and ever richer food/agriculture international corporations.

**Comment ID:** 001300

**Submission Date:** 06/30/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:** Clinical Dietitian

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** If only 13% of the population is consuming greater than 25% of calories from sugar, clearly that will not be a level that will encourage individuals to lower their sugar intake (if they are currently consuming 25% or less from sugar, they will consider that healthy). As a nation, we must reduce our consumption of added sugars by a substantial amount in order to better manage or prevent conditions such as obesity, diabetes, heart disease, cancer, etc. Guidelines for sugar consumption should be reduced to perhaps 10% of calories from sugars.



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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001305

**Submission Date:** 06/30/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Ralph

**Last Name:** Heasley

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** Your report concluded that there was NO evidence that high protein, low carbohydrate diets are better for weight loss and weight maintenance than other diets.

Wikipedia, the on line encyclopedia lists 29 studies of low carbohydrate diets. See reference below:  
. [http://en.wikipedia.org/wiki/Medical\\_research\\_related\\_to\\_low-carbohydrate\\_diets](http://en.wikipedia.org/wiki/Medical_research_related_to_low-carbohydrate_diets)

This reference also states in part 3:  
"Evidence from this systematic review demonstrates that low-carbohydrate/high-protein diets are more effective at 6 months and are as effective, if not more, as low-fat diets in reducing weight and cardiovascular disease risk up to 1 year."

You should change your wording from NO evidence. Please consider this evidence and revise your report to reflect current medical research.

**Comment ID:** 001411

**Submission Date:** 07/08/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sue

**Last Name:** O'Donnell

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** The American public has been subject to an uncontrolled experiment of increased carbohydrate and reduced fat over the past 30 - 40 years. The result has been an unprecedented increase in diabetes and obesity.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

Diabetes is a disease of carbohydrate intolerance; this is not a question.

In all good conscience, how can you continue to advocate a diet emphasizing (mostly refined and processed) carbohydrates at the expense of protein and fats? I understand that the USDA wants to sell American grains, but at what cost to the health of humanity?

Why not recommend a "Balanced Diet" of 100g fat, 100g protein, and 100g carbohydrates (preferably unrefined) as a start? And then recommend adjustments based on reactions to such a balanced diet?

This "same-old-same-old" dietary guideline proposal won't make the diabetes and obesity epidemics get any better. I think it's unconscionable.

**Comment ID:** 001327

**Submission Date:** 07/01/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Shannon

**Last Name:** Westrup

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate, Whole grains

**Attachment:** Y

**Comment:** The official dietary guidelines are dangerously misleading to millions of diabetics, especially type 2 diabetics who don't use insulin. High consumption of fruit, vegetables, and whole grains is completely contrary to the kind of diet required to keep blood glucose in a safe target range, which can be safely designated as under 140 mg/dl.

Advocating optional choices which are higher in protein and fats would be a far better guideline for everyone who must monitor their blood glucose closely. The low-fat campaign of recent years has been proven over and over to be ineffective in preventing obesity OR heart disease. Consuming protein and moderate fats enables diabetics to keep blood glucose in control, which then leads to many other favorable results such as weight loss and reduced lipids.

What is considered "healthy" eating by policy-makers and the non-diabetic world at large, is being found every single day to be unsafe for persons with diabetes. Considering the epidemic of diabetes in this country, it behooves you to stop allowing agribusiness & affiliated industries to control the health and wellbeing of American citizens, and to rethink your guidelines and rebalance your food pyramid.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 000991

**Submission Date:** 06/16/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Steve

**Last Name:** Cooksey

**Job Title:** Diabetes Advocate

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate, Whole grains

**Attachment:** N

**Comment:** YOU have been promoting a low fat, high carb meal plan for 40 yrs!!!

Obesity and Diabetes is at EPIDEMIC levels... STOP THE INSANITY!!!!

<http://www.diabetes-warrior.net/2010/04/28/insanity-is/>

<http://www.diabetes-warrior.net/2010/06/16/insanity-ii-dietary-guidelines/>

**Comment ID:** 000994

**Submission Date:** 06/16/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Linda

**Last Name:** Fox

**Job Title:** not relevant

**Key Topic:** Carbohydrates

**Sub Topic:** Whole grains

**Attachment:** N

**Comment:** As a long-term vegetarian, I was a "good" follower of the dietary guidelines. I nonetheless became diabetic. Having become diabetic I have learned what works for me, my husband, and my family. " Whole grains" is not the answer! NO GRAINS is.

Please do not lead another generation of lemmings over the cliff! I truly believe the obese are the ones who ARE following the guidelines; you are only alienating them from the health professions by preaching the same low-fat, high-carb story and expecting it to WORK.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001076

**Submission Date:** 06/22/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** MaryAnn

**Last Name:** Lastova

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** Y

**Comment:** See Attached

**Comment ID:** 001063

**Submission Date:** 06/21/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sherry

**Last Name:** Smith

**Job Title:** RN

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars, Low carbohydrate

**Attachment:** N

**Comment:** The carbohydrate content of the previous pyramid is deceiving to the average public, as is all the supposed healthy commercial products on the market that are chocked full of sugar, corn syrup, refined grains, and all the other blood sugar, cholesterol raising ingredients. These companies need to understand the research, and then promote it regarding the lipid & cholesterol lowering effects of whole grains & increased fiber & protein in their products rather than the cheapest refined grains & sweeteners they can find. They are killing Americans & most Americans simply buy into it. Cut the refined carbs, eat more fruits & vegetables, & watch America's fat problem, diabetes problem, & skewed lipid panel problem go away. It's worked for 10's of thousands of us!

The FDA is promoting the diabetes epidemic by not understanding the research & buying into the commercialism of the American food industry.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001066

**Submission Date:** 06/21/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Kevin

**Last Name:** Baiotto

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** N

**Comment:** If you really want to make a dent in obesity, start regulating corn syrup and sweeteners. Corn Syrup is in almost everything, canned foods, condiments, it is hard to find foods without corn syrup. This will not be popular with the USDA who has the most control over the food pyramid. It will not be looked on as a good thing by the food industry (farm to grocery store) Friends of mine from England do not like our food because it tastes too sweet.

**Comment ID:** 001068

**Submission Date:** 06/21/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Kevin

**Last Name:** Baiotto

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** If you want to make a dent in obesity, regulate corn syrup. It is an ingredient in many many things that consumers believe are good for them. Canned foods, condiments, and many other packaged foods. To regulate corn syrup you will have to regulate sweeteners, some substitutes are worse for you than corn syrup. The USDA will not want to do this, it will be a huge food industry change. One can only imagine how many needless calories people consume because of sweeteners.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001069

**Submission Date:** 06/21/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Dave

**Last Name:** Bryant

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** The new guidelines are not much different than the old ones. You did get the "less sugar" part right, but we've got to restrict carbs, vegetable oils and flour. The 30 year history of "low fat" hasn't reaped anything but obesity and diabetes. You also need to realize that saturated fat is not the evil you think it is. If it is, then why is human breast milk 43%+ saturated fats? If it were marketed, it would probably catch all kinds of heck because of the fat content. I realize that I'm spitting into the wind here. The agriculture dept puts out the guidelines, so there's going to be no move away from the eat lots of grains dogma. But I can tell you, my own N=1 experience showed that when I got rid of grains, processed foods and most carbs, my oral glucose tolerance test dropped from 198 to 100. I lost 30 lbs and normalized my blood pressure too. This is the experience of many thousands of others too. Overhaul the 2010 Dietary Guidelines now by restricting the carbohydrate consumption and save all of us from reaching the destination full of diseases before it is too late.

**Comment ID:** 001829

**Submission Date:** 07/13/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Jennifer

**Last Name:** Lance

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** Regarding the proposed Dietary Guidelines for Americans, I'm very disappointed once again to have a high carbohydrate, low fat agenda being pushed forward. It's an extremely unhealthy way to eat and the epidemic of obesity, diabetes, and related health problems will only worsen if Americans continue to eat that kind of diet. Low carbohydrate, moderate protein and a higher fat way of eating is the only sensible approach when you look at the research. Don't listen to the sugar and grain lobbies, look at the research.

Thank you.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001887

**Submission Date:** 07/14/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Johnnie Ann

**Last Name:** Montoya

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** The advice you're planning to give -- more of the same low fat/high carb garbage -- DOESN'T WORK. Shame on you. Why are you working for Archer Daniels Midland and Monsanto instead of for the American People? You should be promoting a diet of protein, vegetables and fat, not low fat, high carb diets that make us all fatter and sicker. Try again, I vote a big fat NO on your guidelines.

**Comment ID:** 001442

**Submission Date:** 07/08/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sue

**Last Name:** O'Donnell

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** The proposed Guidelines are largely the same as the guidelines which have failed the American public for the past 30 years. They are not based upon scientific evidence, but rather on "conventional wisdom." There is no credible evidence that a diet containing even 50% fat causes diabetes or heart disease, and there is a great deal of evidence that diets containing over 45% carbohydrates do contribute to obesity, diabetes and heart disease. The health of the American people and others to whom we sell subsidized agricultural foodstuffs is too important to be driven solely by the profit motive. Please look at the evidence. "Good Calories, Bad Calories" by Gary Taubes would be a good place to start.

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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001958

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Wendy

**Last Name:** Martin

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I am horrified and disgusted with the new guidelines as proposed. They are not based on solid science...they are based on politics. The guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry. I majored in food science and nutrition in college and know of what I speak!

Early this year I weighed over 400 pounds and had high blood sugar. I switched to a low carb way of eating and have lost over 100 pounds so far. My doctor has declared that I no longer have diabetes. By eating more meats, dairy, vegetables, fruits, nuts, and good fats such as butter, coconut oil, olive oil and lard plus eating NO breads, white rice, potatoes, sugar or other refined carbohydrates, I have become MUCH healthier.

The dietary guidelines now in place have made folks in the US fatter and sicker! The new guidelines are even worse and out of whack with reality. Please use more solid science and have less influence by profit-centered interest groups.

**Comment ID:** 001968

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Brenda

**Last Name:** Stimpson

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** The nutrition guidelines will only ensure the obesity, diabetes and heart disease epidemics continue. At the very least would someone at USDA please read Taubes book Good Calories Bad Calories where he documents all the evidence for carbohydrates being the root cause of all of the above. Then could you explain to the American public why you are disregarding this evidence and publishing dietary guidelines that only ensure continued ill health for Americans and wealth for certain corporations and special interests. The



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*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

USDA works for the taxpayers, not big agri-business. This is an appalling failure to do what is right for the American public.

**Comment ID:** 002004

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Scott

**Last Name:** Merritt

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** N

**Comment:** After 30 years of government recommendations for lowfat/high carb diets Americans are more obese than ever, diabetes and other metabolic diseases are way up. Yet you are prepared to offer us more of the same advice that's making us sick?

Current nutritional science is proving every day that excess carbohydrates (particularly refined ones) are a large part of the problem. Furthermore the science is showing that saturated fat is actually beneficial.

Please research this impartially prior to issuing your new recommendations. Thank you..

**Comment ID:** 001794

**Submission Date:** 07/13/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sharon

**Last Name:** Johnson

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** As a low carber for over 7 years, I have seen the benefit of this way of eating not only on my weight, but also in my health. My main concern with your current recommendations, is on school children whose nutritional services will have to follow them. Our children are becoming more and more obese at an early age. Many have school meals as their main source of nutrition. Heavy emphasis on sugar, grains and other quickly absorbed carbohydrates is the fuel for this epidemic. At least as adults, we have a choice whether to follow your guidelines for our health. The children do not! A pop-tart for breakfast is not the ideal way to start the day. Flavored milk is no better than a soda. More emphasis should be given to protein and healthy fats (such as butter) and less to easily digested, so called healthy carbohydrates.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

**Comment ID:** 001950

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Mond

**Last Name:** Gu

**Job Title:** Student/ NSCA Personal Trainer/ Precision Nutrition Level 1 Certified/ Cornell Plant Based Nutrition Certificate

**Key Topic:** Carbohydrates

**Sub Topic:** Other, Whole grains

**Attachment:** N

**Comment:** The plan is a vast improvement over the older editions and it would be even better if two parts are added. 1) Differentiation between simple and complex carbohydrates, also addressing the benefits and cons of each. 2) Nutrient timing: for example, after lifting or physical training, simple and complex carbohydrates can be consumed to replenish muscle glycogen as insulin sensitivity is at its peak.

**Comment ID:** 002068

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Laura

**Last Name:** Dolson

**Job Title:** Health Writer

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I am a journalist who has been writing about healthy reduced-carbohydrate diets for six years. Over that time, I have received correspondence from many hundreds of people whose health has been improved using this approach. Complications from diabetes reversed, blood pressure normalized, weight lost, triglycerides plummeting - these are all very very common and are only the most obvious health improvements people can find from reducing the amount of carbohydrate in their diets.

It's time we faced up of the fact that there are individual differences in the body's ability to process carbohydrate. The tragedy is that by and large the nutritional establishment has essentially left people on their own to figure this out for themselves. Even when someone discovers that reducing dietary carbohydrate improves their health, if they don't have adequate information they may eat diets that are nutritionally incomplete, or fall prey to marketers of "low-carb junk food".

I know one man who's H<sub>1c</sub> was 17, and was experiencing many of the dreadful complications of diabetes. Nothing was helping him until he found, on his own, a low-carb diet, which allowed him to bring his H<sub>1c</sub> into normal limits and reverse his diabetes complications. Even with this dramatic success, he could not find an endocrinologist or nutritionist

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

to support him in eating this way, so he was forced to strike out on his own. This, to my mind, is tragic.

We now KNOW, by both science and clinical experience, that reducing carbohydrate in the diet is helpful for many people. That the USDA and people in the nutrition field continue to push high-carbohydrate diets for all is not just short-sighted, it's bordering on immoral, as people's health deteriorates when a relatively simple solution could vastly improve it.

**Comment ID:** 002157

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Barbara

**Last Name:** Sonnier

**Job Title:** Cooking Instructor - The Cancer Project

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** N

**Comment:** I currently reside in Lafayette LA and have been an instructor for the Cancer Project since 2007. Having lost my brother and father to cancer, I have a keen interest in the subject and have decided at age 50+ to return to school to study dietetics. Having been made aware of the latest research on how diet affects cancer prevention and survival, I'm constantly made aware of the large deviations in comments about empirical research particularly that of the presence or lack thereof of the essential amino acids in plant protein. I've been a vegetarian for the last 23 years (since my brother died) and a vegan for the last 3 years. Clearly, there is a large body of evidence pointing to the fact that a starch-based diet is the best source of energy and all nutrients for us and has been backed up as of July 1, 2009 by Dr. Reed Mangels, et al in the position paper on vegetarianism for the American Dietetics Association. While I don't believe that our government should dictate to us what we eat or anything else we choose to do with the boundaries of the law and morality, it is clearly not in our best interest for the guidelines committee to continue to recommend that we eat animal protein.

**Comment ID:** 001274

**Submission Date:** 06/28/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Eric

**Last Name:** Esterling

**Job Title:** Registered Dietitian

**Key Topic:** Carbohydrates, Eating Patterns, Fats

**Sub Topic:**

**Attachment:** N

**Comment:** Please search for "half of grains" and assure each instance correctly states "at least half of grains." For example, page E-1 correctly states: "at least half of all refined grains should be replaced ..." Unfortunately, page B2-8 wrongly states: "... to meet the recommendation that half of grains consumed be whole grains."

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

Shift the emphasis from dietary cholesterol as a CVD risk factor to refined carbohydrate. Page A-6 declares: "Intakes of dietary fatty acids and cholesterol are major determinants of CVD and T2D..." On page A-6, change "cholesterol" to the more appropriate "refined carbohydrates."

The literature is clear that cholesterol does not have the same level of effect as dietary fatty acids. The details on page D3-18, question 2, regarding "the Effect of Dietary Cholesterol" focus almost entirely on cholesterol from eggs. There is no discussion of cholesterol from shellfish. In their review, Kreisberg and Oberman said, "Sterols in shellfish and shrimp do not appreciably influence the serum cholesterol unless fried, cooked in butter, or consumed in large quantities." They also state that cholesterol is not as important as saturated fat. (Kreisberg RA, Oberman A. Medical Management of Hyperlipidemia/Dyslipidemia. The Journal of Clinical Endocrinology & Metabolism 88: 2445-2461.)

On the other hand, reasonably strong evidence suggests refined carbohydrates warrant the same attention as fat intake for CVD and T2D. (Among others: Jakobsen MU, Dethlefsen C, et al. Intake of carbohydrates compared with intake of saturated fatty acids and risk of myocardial infarction: importance of the glycemic index. Am J Clin Nutr. 2010 June;91(6):1764-1768).

Page A-4 makes the excellent recommendation to: "Increase environmentally sustainable production of vegetables, fruits, and fiber-rich whole grains.". I hope this is followed through into moving subsidies from corn and soy to more local fruit and vegetable providers. Schools, home delivered meals, and farmers would benefit from more commodity availability of whole grains, fresh fruits, and vegetables. Unfortunately, I did not find any follow up to this recommendation.

**Comment ID:** 002031

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Mary Ellen

**Last Name:** Camire, PhD

**Job Title:** Professor

**Key Topic:** Carbohydrates, Eating Patterns, Food Groups

**Sub Topic:** Fiber, Grains, Whole grains, Whole grains

**Attachment:** Y

**Comment:** Please see attached for comments on the DGAC technical report.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001983

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Dennis T

**Last Name:** Gordon

**Job Title:** PhD

**Key Topic:** Carbohydrates, Energy Balance/Physical Activity, Nutrient Density/Discretionary Calc

**Sub Topic:** Fiber, Whole grains

**Attachment:** Y

**Comment:** Please see attached comments.

**Comment ID:** 000985

**Submission Date:** 06/15/2010

**Organization Type:** Individual/Professional

**Organization Name:** KUB Consulting

**First Name:** Karl

**Last Name:** Bucus

**Job Title:** Consultant

**Key Topic:** Carbohydrates, Evidence-based Review Process, Fats

**Sub Topic:** Added sugars, Cholesterol, Low carbohydrate, Saturated fatty acids

**Attachment:** N

**Comment:** Reading the preliminary recommendations one is left wondering if any of the participants were even aware of the January 2010 meta-analysis study in The American Journal of Clinical Nutrition regarding heart disease and saturated fat. These findings may contravene conventional wisdom, but they certainly should be acknowledged, and low-carb alternatives should be entertained in a more serious way.

Also, fat intake is implicated in the preliminary recommendations in regards to T2D. There is no literature at all implicating fat with T2D.

I am in the best shape of my life, at 38, vis a vis fitness, weight, blood pressure, the whole magilla. I did it by pretty much doing the opposite of these recommendations. While this is merely anecdotal, I do not think I am some sort of genetic freak. Furthermore, the scientific literature on an almost monthly basis provides evidence suggesting my diet-- high in protein and plants, low on starches and sugars-- is potentially optimal for the human physiology.

Given this it is, frankly, shocking these new recommendations will potentially be functionally identical to the old ones. Given the continued problems presented by CHD and T2D one imagines a different approach would be in order.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

**Comment ID:** 001062

**Submission Date:** 06/21/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** C

**Last Name:** Tobin

**Job Title:** RN

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Cholesterol, Low carbohydrate, Trans fatty acids

**Attachment:** N

**Comment:** In light of the increasing evidence that carbohydrates, especially refined carbohydrates like added sugars, white flour, white rice, and most processed foods are harmful, and have helped contribute to the increase in heart disease, diabetes, cancer, Alzheimer's and other diseases, it is surprising that the USDA continues to recommend a high-carbohydrate diet.

6-11 servings of carbohydrate/day is enough to require diabetics to be on insulin and medications. It is enough to cause several pounds a year of weight gain. It increases triglycerides, lowers good HDL cholesterol, raises blood sugar and causes inflammation. On the other hand, more and more evidence is being uncovered that fats, including saturated fats, are benign and even healthy, particularly in the absence of carbohydrate.

Advocating a low carbohydrate diet - that is a diet based primarily on healthy fruits, vegetables, and safely raised meats, would do much more to enhance the health of our population. Dramatically reducing the average person's consumption of carbohydrates (which could easily be accomplished if we were to lose our superstitious fear of fat) would lead to vast improvements in health, and a dramatic reduction in the demands on our already strained healthcare system.

**Comment ID:** 001031

**Submission Date:** 06/17/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Barrie

**Last Name:** Platt

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Low carbohydrate, Saturated fatty acids

**Attachment:** N

**Comment:** It appears that your recommendations are not much different from those issued thirty years ago. This model - which promotes a low fat diet high in complex carbohydrates - has led to a substantial decline in the percentage of energy intake from total and saturated fats in the United States. At the same time, it has spurred an increase in the consumption

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

of refined carbohydrates and added sugars? a dietary shift that is clearly responsible for the current epidemics of obesity and diabetes.

Carbohydrates are traditionally classified as simple or complex, with complex a healthier alternative. However, many complex carbohydrates produce even higher glycemic responses than do simple sugars. Therefore, the term "complex carbohydrates" is not useful in characterizing the quality of carbohydrates. More useful indicators of carbohydrate quality are fiber content and the type and the extent of processing. Highly refined carbs are the enemy.

Clearly, we must shift the focus of our dietary guidelines from encouraging restricted fat intake and toward encouraging restricted consumption of carbohydrates, especially refined carbs.

You state, "The macronutrient distribution of a person's diet is not the driving force behind the current obesity epidemic." This conclusion is not based on sound principles of science and nutrition. It is based on dietary myths that have been perpetrated over the last 30 years.

The long-time position of "grains" at the base of the pyramid is due largely to food industry influence. The base of the pyramid should be "fruits and vegetables", followed by protein sources, then fats, with the smallest portion being real whole grains and very minimal sugars.

**Comment ID:** 001080

**Submission Date:** 06/22/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Gale

**Last Name:** Erdmann

**Job Title:** retired physical therapist

**Key Topic:** Carbohydrates, Fats

**Sub Topic:**

**Attachment:** N

**Comment:** We have been under guidelines for thirty years that stress low fat but say nothing about low carbohydrate. And we are fatter than we have even been! In truth, a moderately-high fat diet is healthy, in stark contrast to a diet with sugars in any form and white foods such as flour, breads, potatoes, white rice, etc. Please read the reams of compelling research on low-carbohydrate versus low fat diets and encourage the American people to drop the sugars/starches (no matter what the wheat and sugar farmers say, or how much they donate) and go for protein and vegetables, fats and SOME fruit. Then look in another 30 years at the people who have followed your guidelines and see how healthy they are. And slim. It is hard to admit you've been wrong, but it is a sign of strength.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 000973

**Submission Date:** 06/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** David

**Last Name:** Getoff

**Job Title:** Board Certified Clinical Nutritionist and Educator

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Cholesterol, Low carbohydrate, Saturated fatty acids

**Attachment:** N

**Comment:** Once again both science and clinical evidence is ignored in preference to industry?s desires. A failed set of recommendations gets continued as the population gets sicker and fatter. Every individual (and physician and researcher) who has utilized the very low starch, very low sugar diet, has seen its health benefits. This is equally true for those who have used and/or put patients on a diet high in healthy natural fats, including saturated fats, such as butter, coconut oil, whole eggs, nuts avocados, beef, chicken with its skin, etc. The FACT that these diets REDUCE heart disease, obesity, diabetes, cancer, and emotional problems in children, continues to be ignored in favor of concepts which DO NOT WORK but make gobs of money for industry. It is extremely sad that we continue to have a government which cow tows to pressure from the wealthy minority of big business rather than to the good of the people. I hope I live long enough (200 maybe) To be here when all of this nonsense tumbles in favor of facts and the welfare of our citizens. David Getoff, CCN, CTN, FAAIM

**Comment ID:** 001330

**Submission Date:** 07/01/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Markell

**Last Name:** Lewis

**Job Title:** Public Health Nutrition Student

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Saturated fatty acids

**Attachment:** N

**Comment:** I commend the Dietary Guidelines Advisory Committee for including recommendations to "Avoid Sugar Sweetened Beverages" and strongly encourage you to include these recommendations in the final version of the Dietary Guidelines.

Dietary Guidelines should state recommendations in terms of foods, not nutrients.

Dietary Guidelines should specifically name foods high in saturated fat and/or trans fats that should be limited in consumption.



# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

**Comment ID:** 001375

**Submission Date:** 07/07/2010

**Organization Type:** Individual/Professional

**Organization Name:** Carbohydrates Can Kill

**First Name:** Robert

**Last Name:** Su

**Job Title:** Physician/Author/Podcast Host: Carbohydrates Can Kill

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Fiber, Glycemic index, Low carbohydrate, Oils, Unsaturated fatty acids, Saturated fatty acids, Whole grains

**Attachment:** Y

**Comment:** Despite the previously publicized Dietary Guidelines and Food Pyramids, the prevalence of obesity, the average daily calorie intake, and the percentage of kcals from carbohydrate in the US increased during 1971-2000, while the percentage of kcals from total fat ?ironically decreased? and the percentage of kcals from saturated fat also ?notably decreased.?

The US health care spending has continued to rise, e.g. from \$143 per capita in 1960 to \$7,018 in 2006, or an inflation of 49.08 times. Last year, the total health care cost was \$2.4 trillion. Apparently, the dietary guidelines have failed to improve the health of Americans.

Carbohydrates except those high in indigestible fibers afford less satiety than fats and proteins, and are the source of postprandial hyperglycemia, which causes diseases. Using more fats and proteins is the way to improve satiety that affords individuals the dietary control to reduce calorie intake, and facilitate weight loss.

Proposing an important public policy such as the Dietary Guidelines for Americans 2010 must first ?Do No Harm? to all Americans. With the due respect to the members of the Dietary Guidelines Advisory Committee and the staff members of both the USDA and HHS, questions must ultimately be raised as to (1) the individual?s health and fitness of the DGAC and staff, and (2) the individual?s experience of the DGAC and staff in adhering to the Dietary Guidelines.

(1) Each of the DGAC and staff should conduct self-experiments to find out how their series of blood glucose levels (<http://www.carbohydratescankill.com/87/series-of-blood-glucose-tests>) behave before and continued for two hours at every 15 minutes between tests after consuming carbohydrates including whole grains and fruits, vegetables, which they recommend in the Dietary Guidelines. (2) They should try restricting carbohydrates for one week with series of postprandial blood tests as the aforementioned.

The first-hand experience from each of the DGAC and staff will help them sensibly overhaul these Dietary Guidelines 2010 for restoring and maintaining the health of Americans, and, at the same time, for reducing the health care cost.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

**Comment ID:** 001988

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Low carbohydrate, Saturated fatty acids, Whole grains

**Attachment:** N

**Comment:** I am a 25-year diabetic who formerly ate the diet recommended by the ADA, which is in agreement with the proposed guidelines. It made me sicker. Only by eating a very low carbohydrate diet which avoids grains, sugar, fruit, HFCS and starchy vegetables have I gotten control of my disease. I eat plenty of natural animal fats ( no trans fats). I am now off insulin and Byetta and take only metformin. My A1c is typically 5.5. If you are too heavy then you have too much insulin in your bloodstream too much of the time. Insulin is THE hormone that promotes fat storage. If you eat carbohydrates, insulin levels go up. Eat fewer carbs and insulin goes down. This is not rocket science and there are many many studies supporting a low carb diet for weight and blood sugar control. There are many studies showing no relationship between saturated fat and heart disease including a recent one from the Harvard Medical School.

**Comment ID:** 001942

**Submission Date:** 07/14/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Judy Barnes

**Last Name:** Baker

**Job Title:** Author: Carb Wars; Sugar is the New Fat

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Low carbohydrate, Saturated fatty acids

**Attachment:** N

**Comment:** For the past 30 years we have been told to eat less fat because of the supposed link between heart disease and fat intake. But heart disease is still a leading killer and diabetes and obesity have reached epidemic proportions. Diabetes is a condition in which the body's ability to metabolize sugar and starch is impaired, yet the USDA advises everyone, even those with diabetes, to consume most of their calories as carbohydrates. New research is showing that advice to be, not just counter-intuitive, but part of the problem. It is time to return to the good, natural fats that have been blamed for the mess created by the heavily-promoted, "heart-healthy," low-fat foods that replaced them in the American diet.

Eating a diet high in natural fat is a health risk only when the diet contains too much carbohydrate, which provokes the release of insulin, the fat-storage hormone. Insulin inhibits

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

fat burning and leads to obesity and diabetes and all the other diseases that have gotten worse since the government first issued its misguided advice. Fats and proteins are essential to life. Dietary carbohydrates are not.\*

Harvard professor, Mier Stampfer, who worked on the last food pyramid, said that this year's committee "knows perfectly well what the evidence says, but they don't want to shake the status quo or risk confusing the public by changing the message." ([www.slate.com/id/2248754](http://www.slate.com/id/2248754)) What they fail to realize is that their refusal to change their advice to match emerging research is already undermining their credibility. The public would be far more likely to support them if they would acknowledge the existing science. There is no disgrace in changing your mind when the evidence changes. Refusing to alter your position when you know it is wrong is indefensible.

\*The lower limit of dietary carbohydrate compatible with life is apparently zero.? (The Dietary Reference Intakes, the document on which the government supposedly bases its guidelines, Ch. 6, 275)

**Comment ID:** 002087

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Kerstin

**Last Name:** DeRolf

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Added sugars, Fiber, Fish oil, Omega 3 fatty acids, Whole grains

**Attachment:** N

**Comment:** I have only been researching this for the past 1-1/2 years, but... Looking at the history of what people have consumed and, to go with it, both the reason for that particular consumption (location, socio-economic) and their health, it generally tends towards people eating grass-fed animals, non-farmed fish, and fruits and vegetables. It also includes minimally processed fats and fewer grains; those grains that are included are processed differently than today's grains. In general this tends towards more expensive food, but also more nutritious food. No High Fructose Corn Syrup (or the many variations of sugar that are in processed foods), more equal ratios of Omega 3:6 fats, and more fiber and nutrition in general. And what happens? The body feels better, weight does not come and stay (leading to overweight and obese populations), and diseases (or, as I have seen it written, dis-eases) are reduced. I am so far discovering this in my own system.

However, the current guidelines lead towards ever cheaper, more mass-produced foods that "attempt" to satisfy the dietary guidelines...and because they are so cheap, people purchase more of them and in exchange become more overweight and diseased.

Fat is not the evil it is made out to be, grains are not the beneficiary they are made out to be, and oceans are not meant to provide mankind with the majority of their protein. And by eating differently than the dietary guidelines recommend, I and my family are losing weight and becoming healthier...without being on major numbers of medications.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001250

**Submission Date:** 06/26/2010

**Organization Type:** Individual/Professional

**Organization Name:** Abington Nutrition Services LLC

**First Name:** Richard

**Last Name:** Perlmutter

**Job Title:** owner

**Key Topic:** Carbohydrates, Fats, Protein

**Sub Topic:** Added sugars, Saturated fatty acids

**Attachment:** Y

**Comment:** Please see the attached letter.

**Comment ID:** 002052

**Submission Date:** 07/15/2010

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Amy

**Last Name:** Mobley

**Job Title:** Assistant Clinical Professor

**Key Topic:** Carbohydrates, Food Groups

**Sub Topic:** Fiber, Grains, Whole grains, Whole grains

**Attachment:** Y

**Comment:** See attached letter

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002030

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** Grain Foods Foundation and other grain associations

**First Name:** Judi

**Last Name:** Adams, MS, RD

**Job Title:** President

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** Y

**Comment:** We appreciate all of the careful consideration that went into the DGAC's report and agree with many of their conclusions. However, we have included additional research conclusions on several issues when addressing the importance of grains in the diet.

**Comment ID:** 001906

**Submission Date:** 07/14/2010

**Organization Type:** Industry Association

**Organization Name:** Corn Refiners Association

**First Name:** Audrae

**Last Name:** Erickson

**Job Title:** President

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** Attached please find the Corn Refiners Association's comments on the Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001851

**Submission Date:** 07/14/2010

**Organization Type:** Industry Association

**Organization Name:** International Sweeteners Association

**First Name:** Frances

**Last Name:** Hunt

**Job Title:** Secretary General

**Key Topic:** Carbohydrates

**Sub Topic:** Other

**Attachment:** Y

**Comment:** Low calorie sweeteners

**Comment ID:** 002169

**Submission Date:** 07/16/2010

**Organization Type:** Industry Association

**Organization Name:** Tate & Lyle

**First Name:** Susan

**Last Name:** Potter

**Job Title:** Director of Scientific Affairs

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** See attached letter with reference list at end. Please note that this comment was submitted on July 15th prior to 5:00 pm EDT but did not upload into the database due to system constraints.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002048

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** Grocery Manufacturers Association

**First Name:** Jeffrey

**Last Name:** Barach

**Job Title:** Vice President, Science Policy, New Technologies

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc

**Sub Topic:** Added sugars, Saturated fatty acids

**Attachment:** Y

**Comment:** The Grocery Manufacturers Association (GMA) represents the world's leading food, beverage and consumer products companies. The Association promotes sound public policy, champions initiatives that increase productivity and growth and helps ensure the safety and security of consumer packaged goods through scientific excellence. The GMA board of directors is comprised of chief executive officers from the Association's member companies. The \$2.1 trillion food, beverage and consumer packaged goods industry employs 14 million workers, and contributes over \$1 trillion in added value to the nation's economy.

GMA congratulates the 2010 Dietary Guidelines Advisory Committee (DGAC) on their achievement. We thank the staff of Office of Disease Prevention and Heath Promotion and Center for Nutrition Policy and Promotion for this opportunity to provide comments on how we believe the 2010 DGAC report should be used to build a strong and effective 2010 Dietary Guidelines for Americans.

**Comment ID:** 002082

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** American Beverage Association

**First Name:** Maureen

**Last Name:** Storey

**Job Title:** Senior Vice President of Science Policy

**Key Topic:** Carbohydrates, Energy Balance/Physical Activity

**Sub Topic:** Added sugars, Other, Weight maintenance

**Attachment:** Y

**Comment:** Comments on the Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010.

Please see attached document.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002113

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** National Confectioners Association

**First Name:** Alison

**Last Name:** Bodor

**Job Title:** Senior Vice President, Public Policy

**Key Topic:** Carbohydrates, Energy Balance/Physical Activity, Fats

**Sub Topic:** Saturated fatty acids, Weight loss, Weight maintenance

**Attachment:** Y

**Comment:** I. There is a need for clear communication to consumers about the impact of stearic acid on blood lipids.  
II. Modest dark chocolate and cocoa consumption in the context of a balanced diet may have a role in reducing cardiovascular disease risk.  
III. Chewing gum can be part of a strategy to promote dental health and weight management.  
IV. NCA recommends a correction of the definition of "Sugars" in Table D5.1.  
V. There is a place for "little pleasures," such as candy, in an overall lifestyle that supports health, wellness and happiness.

**Comment ID:** 002066

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** The Sugar Association

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Evidence-based Review Process, Nutrient Density/Discretionary Calc

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** The Sugar Association is pleased to offer the attached comments to the Secretaries of the US Departments of Agriculture and Health and Human Services for their consideration as they complete the important process of finalizing the 2010 Dietary Guidelines for Americans.



# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002064

**Submission Date:** 07/15/2010

**Organization Type:** Industry Association

**Organization Name:** USA Rice Federation

**First Name:** Anne

**Last Name:** Banville

**Job Title:** Vice President, Domestic Promotion

**Key Topic:** Carbohydrates, Nutrient Density/Discretionary Calc

**Sub Topic:** Added sugars, Fiber

**Attachment:** Y

**Comment:** Attached is USA Rice Federation comments on DGAC technical report. Thank you.

**Comment ID:** 002093

**Submission Date:** 07/15/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Center for Science in the Public Interest

**First Name:** Margo

**Last Name:** Wootan

**Job Title:** Director, Nutrition Policy

**Key Topic:** Alcoholic Beverages, Carbohydrates, Eating Patterns, Fats, Food Groups, Food Safety, Nutrient Density/Discretionary Calc, Other

**Sub Topic:** Added sugars, Cholesterol, Fish oil, Omega 3 fatty acids, Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids, Vegetables, Whole grains

**Attachment:** Y

**Comment:** The Center for Science in the Public Interest applauds the Dietary Guidelines Advisory Committee (DGAC) for its careful review of the science and generally wise conclusions. Overall, we support the report and urge HHS and USDA to translate the scientific recommendations into 1) policy and environmental changes and 2) a revised understandable and actionable Dietary Guidelines for Americans (DGA) to help people eat more healthfully. In our comments, we focus primarily on maximizing the usefulness of the DGA, and we highlight several concerns about the advisory committee's conclusions.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001911

**Submission Date:** 07/14/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Whole Grain Connection

**First Name:** Monica

**Last Name:** Spiller

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Fiber, Whole grains

**Attachment:** N

**Comment:** Without intervention into the milling baking and agricultural industries, there is no way at present, that the population can be supplied with whole grain products even to the extent recommended in these guidelines. The mismatch is very great indeed for wheat bread. Within the last few years the proportion of commodity wheat milled to whole wheat flour was just 4%.  
An intervention that would create jobs as well, would be to encourage the set up of local mills producing whole wheat flour, using the simple one step process of stone milling. The present widespread technique of roller milling is not conducive to the ideal preparation of a simple whole wheat flour.  
Similarly bakers could be given incentives to produce truly whole wheat breads from locally milled whole wheat. All of this would be a benefit to food security, as well as to local health. Current flour milling is extraordinarily centralized and therefore dangerously vulnerable to disruptions, besides generating refined flour preferentially.

**Comment ID:** 001914

**Submission Date:** 07/14/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** NutraSource Research

**First Name:** Susan

**Last Name:** Cho

**Job Title:** Chief Science Officer

**Key Topic:** Carbohydrates

**Sub Topic:** Fiber, Whole grains

**Attachment:** Y

**Comment:** Fiber continues to be recognized as a nutrient of concern, with fewer than 10 percent of Americans meeting or exceeding their fiber intake goals. On behalf of NutraSource, we request the USDA and HHS to include the importance of fiber and enriched grain foods in the final guidance as follows:

1. Broaden the recommendation for carbohydrates and grains to any grain (enriched or whole) that is at least a good source of fiber i.e., 10% of the Reference Daily Intake (RDI). Bran products, grain products with added fiber and whole grain products can all be important vehicles for increasing fiber intake.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

2. Expand the definition of nutrient-dense foods to allow the inclusion of bran- or fiber- containing grain foods that contribute positively to the diet. Many foods made with enriched grains (such as brans and/or fiber-containing grains) provide positive nutritional value to the diet.

**Comment ID:** 001633

**Submission Date:** 07/12/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Whole Grains Council / Oldways

**First Name:** Sara

**Last Name:** Baer-Sinnott

**Job Title:** President, Oldways

**Key Topic:** Carbohydrates

**Sub Topic:** Whole grains

**Attachment:** Y

**Comment:** Please see PDF for comments.

**Comment ID:** 001307

**Submission Date:** 06/30/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** California Center for Public Health Advocacy

**First Name:** Harold

**Last Name:** Goldstein

**Job Title:** Executive Director

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars, Other

**Attachment:** Y

**Comment:** We are writing to commend the Dietary Guidelines Advisory Committee for including recommendations to ?Avoid Sugar Sweetened Beverages? and strongly encourage you to include these recommendations in the final version of the Dietary Guidelines.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001383

**Submission Date:** 07/07/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Community Medical Centers, Inc.

**First Name:** Erin

**Last Name:** Garcia

**Job Title:** Nutrition Education Coordinator, Registered Dietitian

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** Add upper limit for sugars, especially added sugars for children. The amount of sugar most children (& adults) take in per day is huge & people need more guidelines about what's recommended & WHY it's recommended.

**Comment ID:** 001323

**Submission Date:** 07/01/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** International Scientific Association for Probiotics & Prebiotics

**First Name:** Mary Ellen

**Last Name:** Sanders

**Job Title:** Executive Director

**Key Topic:** Carbohydrates

**Sub Topic:** Fiber, Other

**Attachment:** Y

**Comment:** As an organization of scientists involved in the fields of probiotic and prebiotic research, ISAPP would like to encourage use - and correct reference citations - of the scientifically recognized definitions of probiotics and prebiotics. These are incorrect in the current Guidelines summary, as explained in the attached document. ISAPP does not disagree with the overall current dietary guideline recommendations regarding probiotics and prebiotics that are made in the summary, but we would like to emphasize that: (1) strong associations exist between increasing levels of bifidobacteria in the intestine and numerous health endpoints; (2) emerging discoveries through the human microbiome project and other research will further clarify this relationship; (3) prebiotics represent a tremendous opportunity to increase the overall fiber content of the American diet; and (4) since probiotic effects are both dose- and strain-specific, future Guidelines will need to recognize this when addressing these growing components of the foods supply. Please see the attached document for further details on these perspectives.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001075

**Submission Date:** 06/22/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:**

**First Name:** Carol

**Last Name:** Gorman

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I am convinced that for many people a low carb eating plan is the best for weight control. I am unconvinced that natural fats from animals are harmful. After years of yo-yo dieting mostly following the low fat mantra I discovered low carb. I lost thirty pounds within a year and have maintained my weight loss for the last ten. (5 lb variation) Although 63 I am on no medications. Please look at the latest research and be open to ditching conventional dietary beliefs.

**Comment ID:** 002041

**Submission Date:** 07/15/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** American Heart Association

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc, Protein

**Sub Topic:** Added sugars, Cholesterol, Fiber, Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids, Saturated fatty acids, Sodium, Trans fatty acids, Whole grains

**Attachment:** Y

**Comment:** Please see attached document

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001600

**Submission Date:** 07/10/2010

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Committee for a Healthy Nation

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Glycemic index, Low carbohydrate, Saturated fatty acids

**Attachment:** Y

**Comment:** In its Macronutrient Report (2005), the Institute of Medicine concluded that "Compared to higher fat diets, low fat, high carbohydrate diets may modify the metabolic profile in ways that are considered to be unfavorable with respect to chronic diseases such as coronary heart disease (CHD) and diabetes." Despite claiming to base the 2005 Dietary Guidelines on this report, the USDA continued to recommend a diet low in fat and high in carbohydrates. The recommendations are perpetuated in the current proposal. In Section 1, the DGAC considered the relationship between macronutrient proportion and body weight in adults. DGAC concludes that "diets with less than 45% of calories as carbohydrates are not more successful for long-term weight loss (12 months). There is also some evidence that they may be less safe." Our evaluation of the same science does not support this conclusion. The studies that the DGAC reviewed demonstrate that low-carbohydrate diets improve weight loss, as well as coronary disease risk factors. In addition, the Committee does not hold low-fat, high-carbohydrate diets to the same standard of evidence as low-carbohydrate diets; they fail to question the safety and efficacy of low-fat diets. Recent studies that show that low-fat diets fail to demonstrate results and high-fat diets fail to demonstrate risk were not evaluated. In Section 5, the DGAC addresses the relationship between glycemic index/load and body weight, cancer, type 2 diabetes, and heart disease. They looked at studies that compared the effects of high-glycemic index/load foods to low-glycemic index/load foods. Because total carbohydrates have a more significant effect on glucose and insulin levels, the DGAC chose to frame the carbohydrate question in terms that would ensure they found weak or no associations. The inclusion of relevant science would demonstrate the benefit of carbohydrate reduction on diabetes and other chronic diseases.

**Comment ID:** 001658

**Submission Date:** 07/12/2010

**Organization Type:** Other

**Organization Name:** Dentistry for Children

**First Name:** Kevin

**Last Name:** Boyd

**Job Title:** Pediatric Dentist/Nutritionist (M.Sc.)

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars, Fiber, Whole grains

**Attachment:** N

**Comment:** Diets high in fiber also have been linked to reduced risk of plaque-mediated dental diseases (e.g., caries and gingivitis).

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001661

**Submission Date:** 07/12/2010

**Organization Type:** Other

**Organization Name:** Pediatric Dentist

**First Name:** Dentistry for Children

**Last Name:** Kevin

**Job Title:** Boyd

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** when descibing added sugars as substances utilized for "enhancing palatability" you should clarify with an example (e.g., "enhanced palatability-means exaggerate/magnify intrinsic sweetness)

**Comment ID:** 001770

**Submission Date:** 07/13/2010

**Organization Type:** Other

**Organization Name:** Sensus

**First Name:** Diederick

**Last Name:** Meyer

**Job Title:** Manager Scientific and Legal Affairs

**Key Topic:** Carbohydrates

**Sub Topic:** Fiber, Other

**Attachment:** Y

**Comment:** Dear Ms. Davis,

We respectfully submit our comments on the recommendations of the Dietary Guidelines Advisory Committee. In particular we want to address the following points raised in the chapter on Carbohydrates:

1. The description of carbohydrates;
2. The definition of prebiotics and probiotics and
3. The increase of dietary fiber consumption.

All details can be found in the attachment.

With best regards,  
Diederick Meyer

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

Manager Scientific and Legal Affairs

**Comment ID:** 001779

**Submission Date:** 07/13/2010

**Organization Type:** Other

**Organization Name:** Concerned U.S. Citizens

**First Name:** Trip

**Last Name:** Stakem

**Job Title:** Project Engineer

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** Although, I do not entirely agree with the all of the changes in the new dietary guidelines, I do think the case is made about the reduction of sugars and refined grains. HOWEVER, I would like to see that guideline as part of the pyramid. Avoidance of certain foods is more important than the inclusion of the right foods. The pyramid does describe the difference between whole grains and refined carbohydrates, but it does not indicate that whole grains should be chosen over refined. Your report does indicate that the over consumption of sugar and refined grains likely the cause of the obesity problems in our country. I think that IMPORTANT fact should be reflected expressly in the educational material.

Thank you for your consideration in this matter.

Concerned citizen,

Trip Stakem



# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001934

**Submission Date:** 07/14/2010

**Organization Type:** Other

**Organization Name:**

**First Name:** Jim

**Last Name:** Jozwiak

**Job Title:**

**Key Topic:** Carbohydrates

**Sub Topic:** Other

**Attachment:** N

**Comment:** Most US adults do not have the muscle mass for a high percentage of calories from carbs to be synthesized to glycogen. The insulin resistant do not benefit from dietary carbohydrates. Why are these recommendations ignoring the actual effects they will have on the US population? Lowering fat and increasing carbohydrate is exactly the wrong advice for a population that has difficulty controlling its weight.

**Comment ID:** 001868

**Submission Date:** 07/14/2010

**Organization Type:** Other

**Organization Name:** Ocean Spray Cranberries, Inc

**First Name:** Richard

**Last Name:** Stamm

**Job Title:** Vice President, General Counsel and Secretary

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** Ocean Spray is writing to express its concerns regarding the committee's focus on added sugar and its implications for cranberry products.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001871

**Submission Date:** 07/14/2010

**Organization Type:** Other

**Organization Name:** Hold the Toast Press

**First Name:** Dana

**Last Name:** Carpender

**Job Title:** blogger/author

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** I've been concerned with nutrition since my teens, and thanks to the ubiquitous low fat/high complex carb recommendations I whole-grained-and-beaned my way up to 200 pounds at 5'2". 15 years of a low carb diet loaded with meat, eggs, cheese, butter, and bacon grease have left me 140 pounds, bursting with energy at 51, and with blood work that my doctor agrees is terrific. Your own documents indicate that the advice you're planning to give -- more of the same low fat/high carb garbage -- DOESN'T WORK. Shame on you. Why are you working for Archer Daniels Midland and Monsanto instead of for the American People?

**Comment ID:** 001208

**Submission Date:** 06/24/2010

**Organization Type:** Other

**Organization Name:**

**First Name:** Lucarelli

**Last Name:** Peter

**Job Title:** Field Consultant

**Key Topic:** Carbohydrates

**Sub Topic:** Low carbohydrate

**Attachment:** N

**Comment:** Telling Americans to consume 40% to 60% of regular diet in Carbohydrates which turns to sugar in our systems and fosters weight gain and diabetes makes no sense.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001427

**Submission Date:** 07/08/2010

**Organization Type:** Other

**Organization Name:**

**First Name:** Joan

**Last Name:** Bushman

**Job Title:** Registered Dietitian

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** N

**Comment:** Suggestion: In addition to the current recommendations for carbohydrates and sugars, added sugars' recommendations be listed separately from total sugars. This same suggestion applies to nutritional food labels.

**Comment ID:** 002180

**Submission Date:** 07/19/2010

**Organization Type:** Other

**Organization Name:** PAN-O-GOLD Baking Co.

**First Name:** Howard

**Last Name:** Alton III

**Job Title:** President and CEO

**Key Topic:** Carbohydrates

**Sub Topic:**

**Attachment:** Y

**Comment:** See attached comment which was submitted on July 15th prior to 5:00 pm EDT but did not upload to the database due to system constraints.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002141

**Submission Date:** 07/15/2010

**Organization Type:** Other

**Organization Name:** Reps. Tom Petri, Barney Frank, John Adler, and James McGovern

**First Name:** Tom

**Last Name:** Petri

**Job Title:** Members of Congress

**Key Topic:** Carbohydrates

**Sub Topic:** Added sugars

**Attachment:** Y

**Comment:** Dear Ms. Davis:

We are writing today to express concern about the significant emphasis on added sugar in the Dietary Guidelines Advisory Committee's report published on June 15, 2010. More specifically, we are concerned that the focus on added sugar unnecessarily taints nutrient-rich foods like cranberries as unhealthy despite the documented health benefits of consuming them.

Cranberries have a low level of natural sugar and therefore are sweetened to make them more appealing. However, it is our understanding that even with added sugar, many cranberry products, including sweetened dried cranberries and cranberry juice, contain less total sugar than other products such as 100 percent grape juice or dried fruits like raisins. Furthermore, it is also our understanding that the human body does not distinguish between added sugars and natural sugars. The report's focus on added sugars, however, means that cranberry products are considered unhealthy as a result of their added sugar while other products, which may have higher levels of total sugar, are considered healthy if consumed in moderation. A similar critique could be applied to the 100 percent juice standard.

We also understand that numerous studies have shown that cranberry products provide additional health benefits, primarily but not exclusively related to maintaining urinary tract health. Given these documented benefits and the fact that cranberry products contain comparable or less amounts of total sugar relative to many similar products, we ask the committee to reexamine the focus on added sugar in the report and consider an emphasis on the total amount of sugar in foods.

Thank you for your consideration of these comments.

Sincerely,

Rep. Tom Petri  
Rep. Barney Frank  
Rep. John Adler  
Rep. James McGovern

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 001638

**Submission Date:** 07/12/2010

**Organization Type:** Other

**Organization Name:** General Mills Inc.

**First Name:** Kathryn

**Last Name:** Wiemer

**Job Title:** Fellow/Director, General Mills Bell Institute of Health & Nutrition

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Food Groups, Nutrient Density/Discretionary Calc

**Sub Topic:** Added sugars, Fiber, Fish oil, Omega 3 fatty acids, Grains, Whole grains, Saturated fatty acids, Sodium, Trans fatty acids, Whole grains

**Attachment:** Y

**Comment:** Please see attached letter outlining General Mills' comments on the 2010 Dietary Guidelines Advisory Committee's Technical Report. We appreciate the work of the DGAC Committee during the development process. Please contact me with any questions regarding our comments. Kathy Wiemer

**Comment ID:** 002075

**Submission Date:** 07/15/2010

**Organization Type:** Other

**Organization Name:** Kellogg Company

**First Name:** Nelson

**Last Name:** Almeida, PhD, FACN

**Job Title:** Vice President, U.S./Global Nutrition Science, Labeling and Marketing

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Food Groups, Nutrient Density/Discretionary Calc

**Sub Topic:** Fiber, Grains, Whole grains, Whole grains

**Attachment:** Y

**Comment:** Attached are comments on the Final Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

**Comment ID:** 001045

**Submission Date:** 06/18/2010

**Organization Type:** Other

**Organization Name:** Individual citizen with T2 Diabetes

**First Name:** Barrie

**Last Name:** Platt

**Job Title:**

**Key Topic:** Carbohydrates, Fats

**Sub Topic:** Low carbohydrate

**Attachment:** Y

**Comment:** I am afraid that an individual's comment will not receive the weight it deserves faced with all the input from agribusiness and other food industry interest groups with their resources. Please keep in mind that these guidelines affect the individual US citizen far more than the food industry per se and that it is the citizen for whom they are intended.

It appears that your recommendations are not much different from those issued thirty years ago. This model - which promotes a low fat diet high in complex carbohydrates - has led to a substantial decline in the percentage of energy intake from total and saturated fats in the United States. At the same time, it has spurred an increase in the consumption of refined carbohydrates and added sugars? a dietary shift that is clearly responsible for the current epidemics of obesity and diabetes.

Carbohydrates are traditionally classified as simple or complex, with complex a healthier alternative. However, many complex carbohydrates produce even higher glycemic responses than do simple sugars. Therefore, the term "complex carbohydrates" is not useful in characterizing the quality of carbohydrates. More useful indicators of carbohydrate quality are fiber content and the type and the extent of processing. Highly refined carbs are the enemy.

The advisory committee does encourage more whole grains and I applaud you for that. Unfortunately, this will not be sufficient to reduce obesity and metabolic disorders nor to improve Americans' health overall. You state, "The macronutrient distribution of a person's diet is not the driving force behind the current obesity epidemic." This conclusion is not based on sound principles of science and nutrition. It is based on dietary myths that have been perpetrated over the last 30 years. We must shift the focus of our dietary guidelines from encouraging restricted fat intake and toward encouraging restricted consumption of carbohydrates, especially refined carbs.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002111

**Submission Date:** 07/15/2010

**Organization Type:** Other

**Organization Name:** Missouri Association of Area Agencies on Aging

**First Name:** Catherine

**Last Name:** Edwards, Ph.D.

**Job Title:** Executive Director

**Key Topic:** Carbohydrates, Food Safety, Minerals

**Sub Topic:** Other, Sodium

**Attachment:** N

**Comment:** While we applaud the DGA's Committee recommendation to lower sodium intake to 1,500 mg per day, we ask government agencies to be mindful that in the senior centers, due to funding cutbacks, this may be difficult to achieve, as the centers must rely on canned vegetables (shelf stability) and prepared items (labor costs) both of which are higher in sodium. Also, with homebound seniors, it is necessary to use frozen meals (food safety) which makes lowering the sodium content and offering fresh vegetables, etc. difficult. Further, while we agree with the recommendation that the focus on carbohydrates be on whole grains, vegetables, fruits, and beans, the State has added an extra bread serving and fruit serving as required items here. We believe the centers should have the flexibility to offer another vegetable as the extra carb. Finally, for many of our poor seniors the meal they receive at the center or at their home is the only meal they get in a day. So it is important to be flexible on the caloric range allowed for these meals. Often the senior will split the meal into two or three to last for a day. We would ask that policy makers keep these things in mind as they draft guidelines and regulations.

Respectfully submitted,  
Missouri Association of Area Agencies on Aging

**Comment ID:** 002105

**Submission Date:** 07/15/2010

**Organization Type:** Professional Association

**Organization Name:** American Dietetic Association

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Alcoholic Beverages, Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Food Groups, Food Safety, Other, Protein, Vitamins

**Sub Topic:**

**Attachment:** Y

**Comment:** The American Dietetic Association is pleased to provide the attached comments on the translation of the Dietary Guidelines Advisory Committee report into the 2010 Dietary Guidelines for Americans.

# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic:** Carbohydrates

**Comment ID:** 002121

**Submission Date:** 07/15/2010

**Organization Type:** State/Local Government Agency

**Organization Name:** Boston Public Health Commission

**First Name:** Lisa

**Last Name:** Conley

**Job Title:** Director of Intergovernmental Relations

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Fats, Nutrient Density/Discretionary Calc, Other

**Sub Topic:** Added sugars, Other, Saturated fatty acids, Weight loss

**Attachment:** Y

**Comment:** The Boston Public Health Commission commends the work of the DGAC in attempting to distill a large and often contradictory body of scientific evidence into a comprehensive set of guidelines that for the first time move beyond individual behavior to policy and environmental systems change. We appreciate the Committee's recognition of the severe health threat posed by the increasing rates of obesity and overweight in American communities, and especially the racial inequities in the factors contributing to obesity and related chronic disease; the disparities in rates of obesity and overweight by race and ethnicity are also increasing. As the recipient of Communities Putting Prevention to Work funding from the CDC, BPHC is strongly committed to working in partnership with our local communities and the federal government to utilize the best science to create healthier environments for nutrition and physical activity for all neighborhoods in Boston. BPHC agrees with the Dietary Guidelines Advisory Committee that reducing obesity and chronic disease requires a "coordinated system-wide, multi-sectoral approach" that engages "those in education, government, healthcare, agriculture, business, advocacy and the community" with a fundamental emphasis on primary prevention. We urge the committee to move quickly from advice to an action plan with funding and local government and community partnership.

**Comment ID:** 002037

**Submission Date:** 07/15/2010

**Organization Type:** State/Local Government Agency

**Organization Name:** California Detent of Public Health

**First Name:** Carma

**Last Name:** Okerberg

**Job Title:** Public Health Nutritionist III

**Key Topic:** Carbohydrates, Other

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** Communicating the Dietary Guidelines to the Public: Potential alternative approaches should be evaluated for effectiveness with various population segments. Coordination at the Federal Level: The Dietary Guidelines, food ;package and menu labeling, and the Institute of Medicine reports need to be better integrated and coordinated



# Comments Summary Report

*Submission Date Between 06/15/2010 and 07/30/2010*

**Key Topic: Carbohydrates**

at the federal level, particularly with regard to strategies for the communication of key recommendations to the general public.

Avoidance of Sugar-Sweetened Beverages: CDPH strongly supports this type of clear, understandable food-based messages in food guidance systems, including MyPyramid.

Support for Integrating More Environmental Concerns: CDPH commends the DGAC for recognizing the importance of the environment in influencing food selection, and recommends that environmental approaches be integrated into other federal nutrition programs.